

Verification

Defining Verification

Verification is confirmation of eligibility for free and reduced-price meals under the National School Lunch Program or School Breakfast Program. Verification must include either confirmation of income eligibility or confirmation that the child is included in a currently certified Food Stamp Household or a Temporary Assistance to Needy Families (TANF) assistance unit.

When to Begin Verification

The first consideration in designing a verification plan is when to begin the process. The minimum sample size of applications to verify is based on the total number of approved applications on file on October 31. Students directly certified should not be included in the count; nor should these students be counted as verified. The verification official is not required to wait until October 31 to begin; in fact, School Food Authorities (SFA) are encouraged to begin as early as possible, especially if it has been difficult to meet the deadline in the past. To begin the verification process earlier, estimate how many applications will be on file on October 31. This estimate should be based on the number of applications from previous years. The number of applications to verify is then calculated from this estimate. On October 31 a check must be made of the actual number of approved applications on file to determine if enough applications have been selected. If necessary, additional applications must be selected at this time.

Initially, an application must be approved before it can be verified. Denied applications are not verified. The verification process may begin on an application immediately after it has been approved. The SFA may request that households provide verification information at the time of application. If this procedure is used, processing of the application (approval or denial) must not be delayed

if the household does not provide the requested verification information.

General Requirements

- Annually, each SFA must select and verify a sample of applications approved for benefits. Remember that direct certifications are not subject to verification and are not included in the application numbers.
- The required sample size is based on (1) the total number of approved applications (households whose children are directly certified are excluded from this process) on file on October 31 and on (2) whether the SFA employs random or focused sampling for selecting the applications to be verified. Note: An application is counted as one application regardless of whether it is a multi-child application or an application for one child. The sample size depends on the number of paper applications, not the number of children represented.
 - Under random sampling the SFA must verify a minimum of the lesser of 3% or 3,000 of the total number of approved applications, selected randomly.
 - Under focused sampling the SFA must verify a minimum of (1) the lesser of 1% or 1,000 of the total number of approved

Important Point!

When an SFA requests that the household provide documentation of income at the time of application, the SFA must then carry to completion verification of 100% of the applications on file. In essence by requesting documentation, the SFA has selected all households for verification.

applications, selected from applications with total household income within \$100 monthly or \$1,200 annually of the income eligibility guidelines for free and reduced-price meals; plus (2) the lesser of .5% (one half of 1%) or 500 of the total number of applications that were approved based on categorical eligibility, selected from applications with a Food Stamp/TANF number.

- Any additional applications may be verified anytime during the school year after applications have been approved. The SFA has an obligation to verify any application that contains questionable information.
- The verification official is not required to wait until October 31 to begin the process. To begin the process earlier, an estimated number of applications may be used. However, the SFA must compare this estimate with the actual number of applications on file on October 31 and increase the sample size if the total number of approved applications on file exceed the estimate.
- SFAs may verify more than the required minimum sample, up to 100% of all approved applications, as long as the selection of applications does not involve discrimination against anyone on the basis of race, color, national origin, gender, age, or disability.
- Verification must take place after the application has been approved.

Important Point!

When determining the required sample size of applications to be verified, round all fractions upward.

Important Point!

Although only one adult household member's Social Security Number is required at the time that application for meal benefits is made, Social Security Numbers of all adult household members or an indication that the household member does not have one (the word "none") will be required if the application is selected for verification of income eligibility information. Social Security Numbers are not required when verifying Food Stamp/TANF eligibility.

- The SFA must complete verification of the minimum required sample size by December 15. This includes sending the adverse notice to households whose benefits are reduced or terminated.
- The SFA must complete the verification process for all households that have been notified of their selection for verification and have been asked to submit verification information. For example, the SFA cannot select 5% of the applications on file and notify those households of their selection with the hopes of getting 3% to respond to fulfill the verification requirement. The SFA must follow up with any household notified of their selection. If a household selected for verification transfers out of the SFA before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application must be selected.

Sample Size Requirements-Random Sampling

This method requires the verification of the lesser of 3% or 3,000 of the approved applications on file on October 31; selected randomly.

Steps to Random Sampling

1. Sample Size

- Determine sample size. Multiply the total number of approved applications on file on October 31.

(____) X .03 = (____) or 3,000, whichever is less.

- Round all fractions upward to whole numbers.
- At least one application must be verified.

2. Randomly select the required number of applications.

- A. A selection interval may be used. This can be accomplished by dividing the total number of approved applications on file in the SFA by the

sample size to determine the selection interval (if there are 300 applications on file and 9 are required to be verified, divide 300 by 9 = 33.3). In this case, the selection interval is 33. Number all applications. Randomly select an application from the total approved, and then choose every 33rd application until 9 applications have been selected.

- B. Another random method of selection would be to put all the applications in a container and draw the required number of applications.

3. Verify the applications selected in the sample.

Random Sampling Worksheet Required Sample Size

Number of approved applications on file on 10/31: _____

_____ x .03

= _____ or 3,000 applications, whichever is less. (Round all decimals upward.)

Randomly select the required number of applications.

Tips on Meeting the Verification Deadline

Verification is an annual requirement with the same deadline, December 15, each school year. The deadline is the same whether it falls on a weekday or weekend. Do not wait for a reminder from the State Office to complete the verification process.

To prevent overlooking the verification deadline, it is best to:

1. Mark the date verification is to begin and the deadline for its completion on the SFA calendar of events or a calendar noting other important dates and deadlines.
2. Ensure that more than one person is aware of the deadline and of the verification requirements and/or assign an alternate verification official. This will help if one of the persons is suddenly unavailable to conduct verification.
3. Develop a written verification plan using the verification section of the manual (Section 10).
4. Allow sufficient time for agencies (e.g., Department of Social Services offices) to confirm household eligibility. Thirty days is the minimum an SFA should allow when using agency records in this process. With direct certification, case number verifications should be minimal.

Important Point!

Regulations require that any method used for selecting applications to be verified must be nondiscriminatory. Both random and focused sampling meet this requirement.

Sample Size Requirements—Focused Sampling

This method requires the verification of the lesser of 1% or 1,000 of total approved applications on file on October 31; selected from approved nonFood Stamp/TANF household applications that meet specific criteria, PLUS the lesser of .5% or 500 approved categorically eligible applications on which Food Stamp/TANF case numbers are reported.

Focused/Random Sampling: Advantages and Disadvantages

Focused sampling targets verification efforts on applications with a high likelihood of containing errors; that is, households providing income information on the application and reporting income just below the maximum eligibility level.

Both random and focused sampling are nondiscriminatory. Under the random sampling method, each application must have an equal chance of being selected.

It takes a bit longer to select applications for verification using focused sampling rather than random sampling, but the focused sampling method requires verification of less than half as many applications than if random sampling were used. The reduction in the number of applications which must be verified under focused sampling should more than make up for the extra time spent selecting applications.

Steps to Focused Sampling

1. Sample Size

- **Total Applications**—Count all applications approved for school meal benefits to determine the required sample size.
- **Non-Categorically Eligible Sample Size**—For applications that provided income information, the sample size is 1% of all approved applications on file (total applications x .01).
- **Categorically Eligible* Sample Size**—For applications with Food Stamp/TANF case numbers the sample size is one-half of 1% or .005 x the number of approved applications.
- **Application Types**—Separate the applications into two groups: (1) the categorically eligible applicants that provided a Food Stamp/TANF case number; and (2) the applicants that were approved on the basis of income information (non-categorically eligible).

2. Selection

- **Focused Sample**—From the group that reported income information, select those applications with monthly incomes within \$100 or annual income within \$1,200 of the income eligibility limits.
- If there are more applications with monthly income reported with \$100 (\$1,200 yearly) of the eligibility levels than needed to meet the minimum sample size, select the income application sample using any method that is equitable and ensure that the same households will not be selected year after year.
- If there are not enough applications with income reported within \$100/\$1,200 of the eligibility levels to meet the required minimum sample size, select from those applications with monthly income closest to the eligibility levels.

Focused Sampling Worksheet

Required Number of Applications With Income Information to Verify

Total number of approved applications on file on 10/31:

X _____ .01

= _____ or 1,000 applications, whichever is less. (Round all decimals upward)

From the applications with income information, select applications with reported income of \$100 a month (\$1,200 a year) of the free and reduced-price eligibility guidelines. Continue selecting applications until the required number is chosen.

Required Categorically Eligible Sample

Total number of categorically eligible applications:

X _____ .005

= _____ or 500 applications, whichever is less. (Round all decimals upward.)

From the applications with a Food Stamp/TANF case number, select applications until the required number is chosen.

- If there are not enough applications containing income information to meet the required minimum sample size, verify all the applications approved on the basis of income information.
- From the categorically eligible* group, select the sample using any method that is equitable and ensures that the same households are not selected each year. Remember that direct certifications are not included.

*Households approved on the basis of a case number.

Other Selection Processes

Other selection methods may be used as long as the method does not involve discrimination on the basis of race, color, national origin, gender, age, or disability.

Verification at the Time of Application

SFAs may require households to provide information to verify eligibility for free and reduced-price meal benefits at the time of application. SFAs selecting this option are cautioned that they must not allow verification efforts to delay the approval of applications nor can SFAs disapprove applications based on information submitted for verification. If an application is complete and indicates that the child is eligible for free or reduced-price meal benefits, the application must be approved. Only after the determination of eligibility has been made can the SFA begin the verification process. SFAs selecting this option must observe the following procedures:

1. **Notice to Household**—Include in the notice to the household a statement that, although the initial eligibility determination will be based solely on the application, households are required to submit verification of eligibility information with the application.
2. **Determination of Eligibility**—As applications are returned, review each application to determine household eligibility based on the submission of a complete application. Households must be informed of this initial determination of eligibility. Lack of verification information or submission of verification infor-

mation that does not support the content of the application must not affect the initial determination of eligibility.

3. **Review of Verification Documentation and Notice of Adverse Action**—Any household that fails to submit requested verification information by the date specified by the SFA or that submits verification information which does not support the initial determination of eligibility must be sent a notice of adverse action. This notice must include all the required items in the standard termination/reduction notice, including giving the household ten days advance notice of the termination or reduction of their benefits.

Note: Step 3 may be combined with Step 2 so that the notice of initial approval and notice of adverse action are combined in a single letter.

Once households have been notified of selection and requested to provide income documentation, the SFA must complete the verification process for such households. Verification efforts should be completed within a reasonable time.

Notifying Households of Selection

Household Notification

When a household is selected for verification and is required by the SFA to submit documents or other forms of evidence to verify eligibility, the household

Filing of Verified Applications

All verified applications must be readily retrievable by school and include:

- all documents submitted by the household in an effort to confirm eligibility, OR
- reproductions of those documents, OR
- a written record of the documents submitted by the household including the type of document, e.g., wage stubs or letter from an employer, income shown on the document, time period of the income, and the date of the document.

If a household requests that documentation be returned, the SFA should comply with the request.

South Carolina School Food Service Program Reference Manual
Section 10: Verification

must be sent a notice/letter informing them of their selection and the types of information acceptable to the SFA. The letter/notice must include the information listed below.

1. Notification that the household has been selected for verification
2. Instruction that the household must provide the Social Security Number for each adult household member or indicate that a household member does not possess one
3. A Privacy Act statement
4. Explanation of the types of acceptable information that may be provided to confirm current income, including pay stubs, award letters from welfare departments, Social Security, and support payment decrees from courts
5. Explanation that the household must submit documentation of income received during the most recent month that is available. If this amount is

not representative, the household should contact the SFA for assistance in determining acceptable documentation

6. Instruction that the household may provide proof that the child is a member of a currently certified Food Stamp/TANF household instead of providing income information and Social Security Numbers of adult household members
7. Explanation that information must be provided by a date as specified by the SFA and that failure to do so will result in termination of benefits
8. The name and telephone number of an SFA official who can answer questions and provide assistance

Prototype Notification forms are provided in Form 1 Section 10 Notification of Selection for Verification, pages 1 and 2, below. Full size forms may be found in Section 27.

Form 1 Section 10 Notification of Selection for Verification of Eligibility, Page 1 of 2

WE MUST CHECK YOUR APPLICATION

School: _____ Date: _____

Dear _____:

Your Free and Reduced Price School Meals Application has been selected to be checked. Federal rules require that we do this to make sure only eligible children get free or reduced price meals. You must send us information to prove that names of children are eligible.

Send EITHER:

1. Proof that you get Food Stamps or TANF for your children. Section 2 on page 2 shows what kind of proof you should send. See section 1 for foster children.

OR:

2. Name and Social Security Number* of each adult household member and proof of your household's current income. Section 3 on page 2 shows what kind of proof you should send.

If possible, send copies, not original papers. If you do send originals, they will be sent back to you only if you ask.

You must send the information we need, or contact [name] by [date], or your children will stop getting free or reduced price meals.

Send information to: [address].

If you have questions or need help, please call [name] at [phone number].

Sincerely,

[signature]

*Privacy Act Statement: You must give the Social Security Number of each adult household member or mark the "No Social Security Number" box. This is required by Section 9 of the National School Lunch Act. We may use the Social Security Number to check the information you provide about your household income. You do not have to give your Social Security Number or mark the "No Social Security Number" box, but if you do not, your children will stop getting free or reduced price meals.

Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly. In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, Room 328-W, Whitten Building, 1400 Independence Avenue, SW, Washington DC 20250-9410 or call 202-720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.

Form 1 Section 10 Notification of Selection for Verification of Eligibility, Page 2 of 2

WHAT YOU NEED TO SEND US

1. If your child is a Foster Child:
Send us official documentation from the agency sponsoring the child.

2. If you get Food Stamps or TANF for your children, send us a copy of one of these:

- Food Stamp or TANF Certification Notice that shows dates of certification.
- Letter from Food Stamp or Welfare Office that says you get Food Stamps or TANF.
- ATP Card (Authorization To Participate) with an expiration date. (Do not send your EBT card.)

If you no longer get Food Stamps or TANF for your children and want to find out if your children can continue to get free or reduced price meals:

- A. Complete another Free and Reduced Price School Meals Application with income information for everyone in your household.
- B. Write the name and the Social Security Number of each adult household member below or on another piece of paper, and
- C. Send pay stubs or other papers that show your household's current income.

3. If you do not get Food Stamps or TANF for your children:

A. Write name and Social Security Number of each adult household member below.

Name	Social Security Number (See Privacy Act Statement, p1)	No Social Security Number
_____	_____	<input type="checkbox"/>
_____	_____	<input type="checkbox"/>
_____	_____	<input type="checkbox"/>
_____	_____	<input type="checkbox"/>
_____	_____	<input type="checkbox"/>

B. Send this page along with papers that show the amount of money your household got last month from each source.

The papers you send must show the **name** of the person who received the income, the **date** it was received, **how much** was received, and **how often** it was received.

Acceptable papers include:

Jobs: Current paycheck stub or pay envelope that shows how often pay is received; letter from employer stating gross wages and how often they are paid; or business or farming papers, such as ledger or tax books.

Social Security, Pensions, or Retirement: Social Security retirement benefit letter, statement of benefits received, or pension award notice.

Unemployment, Disability, or Worker's Comp: Notice of eligibility from State employment security office, check stub, or letter from Worker's Compensation.

Welfare Payments: Benefit letter from welfare agency.

Child Support or Alimony: Court decree, agreement, or copies of checks received.

Other income (such as rental income): Information that shows the amount of income received, how often it is received, and the date received.

No income: A brief note explaining how you provide food, clothing and housing for your household, and when you expect an income.

Exception to Notification

When using agency records exclusively to verify eligibility of a household, a selection notice is not required because the household will not have to provide documents or information. Agency records include information received from a County Department of Social Services (DSS) office or other government agency. This information could include confirmation of Food Stamp/TANF participation or income confirmation.

Defining Documentation

Once households have received their notification of selection for verification, they are to send in documentation that verifies their eligibility. There are three methods of documenting household eligibility.

- Written evidence
- Collateral contacts
- Agency records

Any one or a combination of these methods may be used to complete verification. Written evidence is the primary type of documentation. This is evidence submitted by the household that documents the household's current income or current participation in the Food Stamp/TANF programs.

When agency records and/or collateral contacts are used, eligibility documentation is obtained from sources other than the household.

Documentation Methods

Three methods (written evidence, collateral contacts, and agency records) are used for documenting eligibility and therefore satisfying the verification requirement.

1. Documentation Methods: Written Evidence

This is information received directly from the household, such as income documentation or proof of Food Stamp/TANF participation when submitted by the household. Whenever possible, use written evidence as the primary source of information to confirm household eligibility.

The notification of selection for verification must include a request for the household to submit written evidence of current income for all household members and the Social Security Number of each adult household member 21 years of age or older or written evidence to show that the household receives Food Stamp/TANF benefits for the child.

If the household does not respond to the request for income information and/or Social Security Numbers or written evidence of participation in the Food Stamp/TANF programs or submits insufficient or obsolete written evidence, the SFA may do one of two things:

- SFA officials may contact the household to request the missing written evidence and inform the household that failure to comply or to designate a collateral contact will result in termination of benefits, OR
- SFA officials may terminate the household's benefits for failure to respond to the request for written evidence.

Verification is considered completed when the advance notice of adverse action is sent to the household.

Request for Written Evidence of Income Eligibility

When providing written evidence of proof of income, households must submit documents that show current income, meaning income received by the household during the month prior to verification. The document should contain the name of the household member, amount and the date the income was received. A pay stub with no

date would be insufficient. For example, if verification selection notices are sent to households in October, expect to receive income documentation for the month of September.

For applications based on income, eligible households must report any money received on a recurring basis, including gross earned income. Specifically, gross income means all money earned before such deductions as the examples below illustrate.

- Income taxes
- Employee's social security taxes
- Insurance premiums
- Bonds

Examine the documentation of current income submitted by the household for those items listed below.

- Name
- Date
- Amount of income stated to determine if it is sufficient to document total current income

In general, anything considered as income for the initial application process is also considered as income for verification purposes. Households must provide income information for the most recent full month that is available. The following listing contains suggestions of sources of acceptable types of written evidence to be used as income documentation. This list is not all-inclusive and additional sources may be requested.

Earnings—Wages and Salary: total gross earnings before the withholding for FICA, taxes, or other deductions such as insurance.

- Current paycheck stub
- Current pay envelope
- Letter from employer stating gross wages paid and how often they are paid

Earnings of Self-Employed Business Person

or Farmer: If the applicant is a self-employed business person or farmer, net income should be used. Note: Many of the assets of self-employed business persons are on paper and their cash or net worth is often very low, although they may hold considerable property and equipment (assets). They should report only their actual cash income, not assets.

Households with other forms of income should provide information and/or documents that show the amount of income received, how often it is received, and the date received. For example, for self-employment income the items listed below would be acceptable documentation.

- Business or farming documents, such as ledger books and/or self-issued paycheck stub
- Last quarterly tax estimate
- Last year's tax return

Cash Income: Some persons who work in situations where the employer does not want to be responsible for withholding, such as domestic workers, casual laborers, or persons working for an individual or small business on an irregular basis, may receive wages in the form of cash.

- A letter from the employer stating wages paid and frequency

Social Security Retirement: More correctly named Old Age and Survivors Disability Insurance, it actually includes the traditional retirement benefit, payments to survivors (spouses and children) and disability payments. (The disability payments are similar to SSI.) Please note that younger persons (pre-retirement) and their dependents can also receive disability payments.

- Social Security retirement benefit letter
- Official statement of benefits received
- Monthly check

Supplemental Security Income (SSI): Not a retirement pension, SSI is a special funding program to assist households with aged, blind, or disabled members. Often, if a child has a learning disability, the household will receive a monthly SSI assistance payment. Please note that some applicants will refer to these payments as “disability” and may not understand that it is a form of Social Security payment.

- SSI eligibility letter
- SSI check
- Official statement of benefits received

Unemployment Compensation/Disability or Workers’ Compensation:

- Notice of eligibility from State employment office
- Copy of the disability award letter/unemployment compensation award letter.
- Check stub
- Agency records

TANF Program: A welfare payment intended to assist eligible persons to meet the costs of daily living. Most often these payments are made to families with needy children under the age of 18 (21 if in school) where a parent is absent from the home.

Retirement/Pension: This refers to non-Social Security retirement. It includes private pensions, State pensions, veterans, and/or military retirement.

- Official statement of benefits received
- Pension award notice

Railroad Retirement or R. R. Benefit: A special government retirement fund for former employees of the railroads. Payments can be made to survivors (spouses and children).

- Official statement of benefits received
- Railroad retirement award letter

Veterans Payments: Money paid periodically by the Veterans Administration to disabled members of the Armed Forces or to survivors of deceased veterans.

- Official statement of benefits received
- Veterans Administration award notice

Child Support or Alimony: This is a payment by a separated or divorced spouse for the support of children or the spouse. Although the court has ordered (decreed) a monthly amount or an amount was agreed upon, payments may be infrequent or irregular. Only actual payments and not the amount that is supposed to be received should be reported.

- Copies of checks or other proof of payments received
- Court decree or agreement

Military Housing Allowance: This may be received if an adult member of the household is a member of the military and the household is located off-base.

- Leave and earnings statement
- Letter from the base commander stating amount and frequency of allowance

Rental Income: This is room and board payment by non-household members living in the home.

- Rental agreement or letter from non-household members stating amount paid

Zero Income: On occasion, a household may report no income on the application. This might occur if a person is a live-in housekeeper and receives only room and board as compensation for work done, or if a household is being supported by nonmonetary means provided by religious or civic organizations due to illness or disability. A household can be asked to provide a written statement describing the household’s circumstances, including how the household pays for

food, housing, etc., when no income is reported. In lieu of requesting such a written statement, the SFA may want to use a collateral contact approach to verify the application.

- Written statement from household describing how it subsists
- Collateral contact

Request for Written Evidence of Categorical Eligibility

The SFA can place the responsibility for verifying receipt of Food Stamp/TANF benefits on the household. The notification of selection must include a request for the household to submit written evidence of current certification to receive Food Stamp/TANF benefits. Every time a household is approved for Food Stamp/TANF benefits, they are furnished with a written letter of certification or notice of eligibility. The verifying official should examine this notice of eligibility to ensure that the child for whom application was made is part of a household currently participating in the Food Stamp/TANF program.

A Food Stamp/TANF document that does not specify the certification period is not adequate for documentation. For example, the food stamp identification card or Electronic Benefit Transfer (EBT) card is not acceptable because it does not have an expiration date.

A household that does not have satisfactory categorical documentation may request a signed, dated letter from the County DSS office certifying that the child is part of a household currently receiving benefits.

Verification is complete when the household submits adequate documentation of current participation in the Food Stamp/TANF program or a letter of adverse action is sent.

2. Documentation Methods: Collateral Contacts

A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income or Food Stamp/TANF status.

When the household has been unable to provide adequate written evidence, the household may identify a collateral contact from which the SFA could obtain the requested information, either orally or in writing. Collateral contacts include employers, social service agencies, migrant workers' agencies, and religious or civic organizations.

The verifying official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.

The verifying official must give the household the opportunity to designate the collateral contact. However, the verifying official may select a collateral contact if the household fails to designate one or designates one that is unacceptable to the verifying official. In either case, no contact may be made without first notifying the household and obtaining their permission.

A collateral contact would not be expected to provide Social Security Numbers of the adult household members. These still must be provided by the household. The SFA will examine any written information provided by the collateral contact or evaluate any oral information. Based on this information a determination will be made.

If the collateral contact is unwilling or unable to provide the requested information, then the household's benefit is to be terminated for failure to respond.

All collateral contacts are to be documented, dated, and initialed.

3. Documentation Methods: Agency Records

A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the SFA has legal access. Although United States Department of Agriculture (USDA) regulations do not require that households be notified of selection when verification is made through agency records, such agencies may have their own notification requirements.

Food Stamp/TANF Records—Using agency records to verify the eligibility of households who were approved for meal benefits on the basis of Food Stamp/TANF case numbers can be accomplished by submitting a list of names and Food Stamp/TANF case numbers to the local DSS office. That office will then confirm whether the households are currently receiving Food Stamp/TANF benefits.

When using agency records, the SFA should request information for the most recent month available. Households that dispute the validity of information acquired through systems of records must be given the opportunity to send more recent information during the ten-day period of advance notice of adverse action.

When verifying eligibility through a County DSS office, begin as early as possible to allow sufficient time, at least 30 days, for that office to respond to the request. Additional time may also be necessary to acquire other verification information from households if the agency contacted reports that some households are not currently receiving Food Stamp/TANF benefits. Sample letters and forms you may use when requesting assistance from a Food Stamp/TANF office are shown in Form 6 Section 10, pages 1 and 2, below. Full size forms for printing may be found in Section 27.

Form 6 Section 10 Letter to the Food Stamp/TANF Office (DSS) from the SFA
Page 1 of 2

School/SFA: _____ Date: _____

Dear _____:

The receipt of food stamps or TANF automatically qualifies children for free school meals. The regulations for the Food Stamp Program and the TANF Program permit Food Stamp and DSS Offices to release eligibility information to administrators of the National School Lunch and School Breakfast Programs to ensure that only eligible children receive free meal benefits.

Enclosed is a listing of approved free meal applicants who have been selected for verification and who have indicated that the child for whom application was made now receives food stamp and/or TANF benefits. On the enclosed listing, please indicate if these household members are currently participating in the Food Stamp and/or TANF Program. This information will be used only to confirm the approved applicant's eligibility for free meal benefits.

Your return of the listing by _____ will be appreciated. A self-addressed return envelope is also enclosed for your convenience. If you have any questions or need additional information, please contact _____ at telephone number _____.

Sincerely,

Signature Date

Address

Telephone Number

Enclosure Verification Form—Food Stamp/TANF Recipients

Form 6 Section 10 Letter to the Food Stamp/TANF Office (DSS) from the SFA
Page 1 of 2

School/SFA: _____ Date: _____

Dear _____:

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Your return of the listing by _____ will be appreciated. A self-addressed return envelope is also enclosed for your convenience. If you have any questions or need additional information, please contact _____ at telephone number _____.

Sincerely,

Signature Date

Address

Telephone Number

Enclosure Verification Form—Food Stamp/TANF Recipients

In addition, consider reducing the number of applications verified in this manner to the minimum requirement plus any that contain information which appears questionable. In recent years, many SFAs have elected to verify through agency records 100% of the categorically eligible households. This places an unnecessary burden on the State and local DSS office. With the provision of direct certification listings from the State Authority (SA), the actual number of households qualifying for meal benefits based on an application and case number should be minimal.

Unacceptable Documentation

Tax forms are not considered acceptable proof of income except for households with irregular income (seasonal workers, self-employed persons, etc.). In these cases, tax forms may be used to project the amount of income the household expects to receive for the current year.

With regard to Food Stamp/TANF households, documentation that does not specify the certification period is not adequate proof of participation. For example, the EBT or Electronic Benefits Transfer card is not acceptable because it does not have an expiration date. Also, actual food stamps themselves are not proof because they cannot be identified as belonging to a particular household.

Important Point!

If verification results in higher benefits (e.g., a child who is moved from the reduced-price to free category), this change is effective immediately. Parents should be notified through whatever channels the SFA uses to notify the household of approval for benefits.

Unresponsive Households and Follow-Up

If the household does not respond to the verification request or submits insufficient or obsolete written evidence, SFA officials may contact the household to request the missing written evidence of current income and advise the household that failure to comply or designate a collateral contact will result in termination of benefits.

When the SFA gives the household a second opportunity to respond to the verification notice, sufficient time must be allotted in the verification plan for the information to be submitted by the household and reviewed before the deadline. Sending out a second request for information will add at least ten days to the process. This ten-day period can be eliminated, and the household still can be given a second opportunity to respond, if a termination/reduction notice containing a second request for the information is sent to the household.

It is important to remember that the SFA is not required to follow up with unresponsive households. Again, when households are given a second opportunity to respond, be sure to allow for this additional time in your verification plan.

If after the second notice is sent, the household subsequently submits sufficient written evidence, then the verification requirement has been satisfied.

If the household still does not submit sufficient written evidence or fails to respond, terminate benefits on the date indicated on the adverse notice.

Defining Verification Completion

Verification of the required sample size must be completed by December 15 of each year. Verification of a household is considered to be complete when one of the following has been accomplished:

- When the income documentation or proof of Food Stamp/TANF participation received supports the household's previous level or higher level of eligibility, OR

- If eligibility is not confirmed or if documentation is not received when the termination/reduction notice is sent to household.

The date on which one of the above actions is completed for all households selected is considered the date on which verification is complete.

One of the major reasons cited by SFAs for not completing verification by the December 15 deadline is the additional time needed to follow up with households that do not respond to the verification selection notice. The SFA does not have to wait indefinitely for households to respond in order to complete the verification process. The meal benefits of households that do not respond by the date specified in the selection notice can be terminated ten days after a termination notice is sent to such households. Verification would be considered complete for such households on the date the termination notice is sent. The SFA may give households a second opportunity to respond to the verification notice. If households provide documentation after the termination/reduction notice is sent, the SFA must accept and process the information. This will not alter the date that verification is considered to be complete.

The following additional steps of the verification process must be taken and may actually take place after the official completion date but are not considered in determining the completion date.

- Process any additional income or other documentation households provided after the due date.
- Terminate or reduce the meal benefits of affected households ten calendar days after the date of the termination/ reduction notice.
- Increase the meal benefits of households.

Verification Results

Verification of a household's income eligibility for free or reduced-price meals must result in one of the following:

No change in benefit level—The household's current documentation supports the level of benefits for which the household has been approved.

Reduction in benefit level—The household's current documentation identifies income too high for the level of benefits for which the child has been approved. Therefore, the household's eligibility must be changed from free to reduced-price or from free or reduced-price to paid. Changes in eligibility resulting in decreased benefit levels must be made in ten calendar days.

Increase in benefit level—The household's current documentation qualifies the household for free meals rather than reduced-price meals. Therefore, the household's eligibility must be changed from reduced-price to free meals. Changes in eligibility resulting in increased benefit levels must be made in three operating days.

Record of Verification Process

Either directly on the application or elsewhere, SFAs should keep a full record of the verification process including:

- copies of notices/letters sent,
- dates notices were sent,
- notes on any contacts made,
- results of verification,
- reasons for any denial or change of eligibility and the date, and
- signature of the verifying official.

This documentation is useful in demonstrating proper verification when SFAs are reviewed by the SA and would be needed in case of an applicant's appeal.

Termination of benefits—Free and reduced-price benefits must be terminated for households that do not respond to verification efforts or whose current documentation does not support eligibility for either free or reduced-price meals.

If verification results in a change in benefit level or termination, the change must be extended to all children in the household who were determined eligible by information that no longer supports the benefit level. All reasonable efforts must be made to ensure these changes.

Notification of Adverse Action

When verification results in a reduction or termination of benefits, households must be sent a written notice prior to the changes in benefits. This notice must give households a ten-calendar-day notice before benefits are stopped. The first day of the ten-calendar-day period is the day the notice

is sent. A prototype termination/reduction notice, Form 2 Section 10, Letter of Verification Results, is provided below. This form is to be used when income eligibility or participation in Food Stamp/TANF program(s) was not confirmed. The SFA may choose to also use this form to notify that the verification process has been completed with no change in eligibility. A full size version of this letter may be found in Section 27.

Benefits During Appeal of Verification Results

When a household appeals a reduction or termination of benefits within the ten-calendar-day advance notice period, the SFA **must** continue to provide the benefits for which the child was originally approved until a final determination is made.

When a household does not appeal a reduction or termination of benefits during the ten-calendar-day

Notification of Adverse Action

This notice must advise the household of:

- the change in benefits,
- the reasons for the change,
- that an appeal must be filed within the ten-calendar-day advance notice period to ensure continued benefits while awaiting a hearing and decision,
- the instructions on how to appeal,
- that the household may reapply for benefits at any time during the school year, and
- that Food Stamp/TANF households may submit an application containing household names and income information and provide written evidence of current household income and the social security numbers of adult household members.

Form 2 Section 10 Letter of Verification Results

WE HAVE CHECKED YOUR APPLICATION

School: _____ Date: _____

Dear _____:

We checked the information you sent us to prove that [names of children] are eligible for free or reduced price meals and have decided that:

☐ Your children's eligibility has not changed.

☐ Starting [date], your children's eligibility for meals will be changed **from reduced price to free** because your income is within the free meal eligibility limits. Your children will receive meals at no cost. You must tell the school when your household income goes up by more than \$50 per month (\$600 per year) or when your household size goes down.

☐ Starting [date], your children's eligibility for meals will be changed **from free to reduced price** because your income is over the limit. Reduced price meals cost [\$] for lunch and [\$] for breakfast. You must tell the school when your household income goes up by more than \$50 per month (\$600 per year) or when your household size goes down.

☐ Starting [date], **your children are no longer eligible** for free or reduced price meals for the following reason(s):

____ Records show that you are not receiving Food Stamps or TANF at this time.

____ Your income is over the limit for free or reduced price meals.

____ You did not provide: _____

____ You did not respond to our request.

Meals cost [\$] for lunch and [\$] for breakfast. If your household income goes down or your household size goes up, you may apply again. If you did not provide proof of current eligibility, you will be asked to do so if you reapply.

If you disagree with this decision, you may discuss it with [name] at [phone]. You also have the right to a fair hearing. If you request a hearing by [date], your children will continue to receive free or reduced price meals until the decision of the hearing official is made. You may request a hearing by calling or writing to: [name], [address], [phone number].

Sincerely,

[signature]

Non-Discrimination Statement: This explains what to do if you believe you have been treated unfairly. In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write to *USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington DC 20250-9410* or call 202-720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.

advance notice period, or the hearing official rules that benefits **must** be reduced, the actual reduction or termination of benefits **must** take place no later than ten operating days after the ten-calendar-day advance notice period, or ten operating days after the decision by the hearing official.

Hearing Procedure

- The hearing procedure in the SFA's free and reduced-price policy statement must be followed.
- The hearing official must be an individual who is not involved with the approval or verification process.
- The household may request an SFA conference prior to a formal hearing. Any such conference must not prejudice a later appeal.

Households that Reapply for Program Benefits

Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. However, those households terminated for failure to respond to verification efforts that reapply in the same school year may be required to submit income documentation or proof of participation in the Food Stamp/TANF programs at the time of reapplication. The SFA may verify the households' eligibility prior to approval. These are not considered new applications since these households did not comply with the verification requirements.

Record Keeping Requirements

Individual Application

Form 3 Section 10, Verification Tracker, provides a prototype format where the verifying official may record individual application information indicating:

- the application was selected for verification,

- details have been entered on the verification roster,
- the results of verification,
- the date, and
- the signature of the verifying official.

A full size version of this form is provided in Section 27. This form should be attached to the application being verified. Alternatively, this information may be recorded directly on the application if space is provided.

The SFA may use Form 4 Section 10, Verification Roster, to compile the individual application tracking information. A full size version of the Verification Roster is provided in Section 27.

When a change in eligibility occurs due to verification, new information indicating changes to household size, income, etc., must be documented on the application form. The application

Form 3 Section 10 Verification Tracker

VERIFICATION TRACKER FOR SCHOOL USE

Date Verification Notice Sent:	_____
Date Response Due from Household:	_____
Date Second Notice Sent (or N/A):	_____
Approval Based On:	
<input type="checkbox"/> Food Stamp/TANF Case Number	
<input type="checkbox"/> Household Size and Income	
Verification Result:	
<input type="checkbox"/> No Change	
<input type="checkbox"/> Free to Reduced	
<input type="checkbox"/> Free to Paid	
<input type="checkbox"/> Reduced to Free	
<input type="checkbox"/> Reduced to Paid	
Reason for Change:	
<input type="checkbox"/> Income: _____	
<input type="checkbox"/> Household Size: _____	
<input type="checkbox"/> Change in Food Stamp/TANF	
<input type="checkbox"/> Did not respond	
<input type="checkbox"/> Other: _____	
Date Notice of Change Sent:	_____
Date Change Made:	_____
Date Hearing Requested:	_____
Hearing Decision:	_____
Verifying Official's Signature:	_____
Date:	_____

SFA Summary

- a description of the selection method(s) used,
- the total number of approved applications on file on October 31,
- the number and percentage of applications verified by December 15,
- the number of students on the applications verified and the number whose benefits changed, and
- documentation of the reasons for reduction or termination of benefit.

[illegible]

State Agency Requirements

Verification Extension Requests

Form 5 Section 10 SFA Verification Summary

School Food Authority Verification Summary

Year: _____

SFA Name: _____

Description of Selection Method (check method used)

_____ Random Sampling

_____ Focused Sampling

_____ 100%

_____ Other (Describe): _____

Total Number of Approved Applications on file as of October 31, 20 ____ : _____

Summary of Verification Results

Number Verified

Percent Verified

If Focused:

Number of Food Stamp/TANF Applications on File
October 31: _____

Number of Food Stamp/TANF Applications Verified: _____ %

Number of NON-Food Stamp/TANF Applications
Verified: _____ %

If Random or Other Method:

Number of Applications Verified: _____ %

Verification Results:

Number of students (including siblings, if applicable)
whose benefits changed from:

Free to Reduced: _____

Reduced to Free: _____

Free or Reduced to Ineligible (Paid) _____

Terminated due to No Response: _____

The above SFA-wide data and the information noted for each verified application must be maintained
on file for review purposes.

Signature of Verifying Official

Title of Verifying Official

Date Verification was Completed

When to Apply for a Verification Extension

Apply for an extension of the verification deadline as soon as it is determined that verification will not be completed by the deadline.

Criteria for Approval of Extension Requests

Requests for extensions of the verification deadline will be approved only when unforeseen circumstances or circumstances beyond the control of the SFA cause a delay in the verification process. Examples of such circumstances are:

- natural or other disasters that damage or destroy buildings or records preventing the completion of the process,
- strikes that prevent access to the necessary records by the personnel assigned to complete the verification process, or
- sudden absence (due to illness, injury, death, resignation, etc.) of the verification official or other persons directly responsible for conducting verification.

These are only examples and all requests will be considered individually on their merit. Please be advised that requests based on the fact that the persons involved forgot about the process, were involved in other work projects, or that the previous verification official resigned or otherwise became unavailable months before the deadline will not be approved.

Verification Extension Request

Information included in the extension request will be:

- the name, address, and telephone number of the SFA,
- the name and title of the verification official,
- the date by which the SFA expects to complete verification, and
- a specific description of the reason(s) why the SFA was unable to complete verification by the deadline (the information provided must be specific enough for USDA to determine whether an extension is warranted. Requests that do not provide sufficient information cannot be processed and will be returned to the SFA for more information), and
- the signature of an SFA official.

Requests for extensions should be sent to the State Office as soon as possible for a determination.

Questions Answers

1.Q: What kind of written evidence is required for verification of a foster child's application?

A: SFA officials should contact the household in which the foster child resides and ask for the name, agency, and phone number of the social worker assigned to that child. A phone call to the social worker confirming the child's status as a foster child and the amount of money designated by the agency for the child's personal use would be sufficient verification. The SFA official should, however, document the phone conversation with the social worker (identifying the social worker, agency, and phone number; the status of the child; and the child's personal use income). Another approach would be to ask the foster family and the placement agency for a copy of written communication in which the status of the child and the financial arrangement is stated. If the family is unable to provide such information, a phone call to the placement agency to confirm the child's status and income should be made prior to denying the child free meals.

2. Q: What if other agency records are used and the agency does not provide a response before December 15?

A: Any extensions to the December 15 deadline must be approved in writing by USDA through the State Office. If the SFA contacted another agency well in advance of the December 15 deadline, it has demonstrated good faith and would likely be given an extension.

3. Q: How is overtime income counted for purposes of verification?

A: The SFA official should work with the household to determine whether the overtime for the month being verified is representative

of overtime received in other months. If the overtime is a one time or sporadic source of income, income should be calculated based on the regular monthly income (without overtime).

4. Q: In verifying eligibility, is it to be eligibility at the time of application or current eligibility?

A: Verification is intended to establish current eligibility. When written evidence or collateral contacts are the primary sources of information, the SFA must require submission of income information for the most recent full month that is available. When using a system of records, the SFA may choose to verify a recent month and the entire sample may be verified for the same month. Households that dispute the validity of income information acquired through systems of records must be given the opportunity to produce more recent income information.

5. Q: If the SFA chooses to do 3% verification, must it select 3% of the applications from each school in the SFA or is the sample selected from the SFA as a whole?

A: SFAs are required to select and verify a sample of their approved free and reduced-price applications. The SFA as a whole must meet the 3% sample. It does not mean that each school has to do 3%. The sample may be selected from one or more schools or from the SFA as a whole provided that the verification efforts are applied without regard to race, color, national origin, gender, age, or disability. Also, any selection method must ensure that all applications are subject to being sampled, *i.e.*, if the SFA has decided to select the 3% verification sample from only one school in the SFA, all applications in that one school must have an equal chance of being selected.

Questions Answers

6. Q: If a sample size is 4.2 applications, is it necessary to verify 4 or 5?

A: Five. Partial numbers must be rounded up to the next whole number.

7. Q: Is it required to maintain the actual documentation from verification or just the results of verification?

A: SFAs are required to maintain a description of their verification efforts. The description must summarize the selection process and source of information used, the total number of applications on file on October 31 and the percentage or number of applications verified. SFAs are encouraged to maintain a record of the actual information received. SFAs should maintain records for those households whose benefits are reduced or terminated, since the actual documentation would be useful in supporting the verification findings if appealed by the household.

8. Q: If a household is paid weekly and submits a pay stub for a week, must I go back and ask for pay stubs for a whole month?

A: If the weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient for you to calculate a full month's income. If the weekly pay stub is not representative of what the household receives each week, pay stubs for an entire month must be submitted.

9. Q: When an advance notice of adverse action has been sent to a household, can I claim reimbursement for that child during the period covered by the advance notice?

A: Yes. The household must be given ten calendar days advance notice that a change is being made in the child's eligibility status. During that time, the child must continue to receive free

or reduced-price meal benefits, and the SFA may continue to claim reimbursement for free or reduced-price meals served to the child during this period.

10. Q: What if a child is selected for verification, but then transfers out of the SFA before the information can be verified?

A: Verification is considered complete when a household's eligibility for the level of benefits for which it was approved is either confirmed or a letter of adverse action has been sent. If a child is selected for verification but transfers out of the SFA before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application **MUST** be selected.

11. Q: Must students approved for free meal benefits through direct certification be included in the verification process?

A: No. Verification efforts are not required for children who are eligible for free meal benefits under direct certification procedures.